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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MATTHEW JACKSON, an individual,  
  
Plaintiff,  
  
vs.  
  
UNICITY INTERNATIONAL, INC., a  
Delaware corporation; ANYTIME LABOR,  
L.L.C., a Nevada limited liability company,  
  
Defendants.

Case No. 2:25-cv-00738-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT  
  
(THIRD REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Matthew Jackson ("Plaintiff"), by and through his counsel, Greenberg Gross LLP, and Defendant, Anytime Labor, L.L.C. ("Anytime Labor"), by and through its counsel, the law firm of Jackson Lewis P.C., that Defendant shall have a 1-week extension up to and including **July 7, 2025**, in which to file its response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Defendant Anytime Labor was served with the Summons and Complaint on May 15, 2025, (ECF No. 1).
2. The Parties stipulated to continue the deadline for Anytime Labor's responsive pleading on two occasions with the deadline for response currently being June 27, 2025.
3. Since the Parties stipulated to continue the deadline for Anytime Labor's responsive pleading, the Parties have been communicating to determine whether this matter will proceed to

1 arbitration.

2 4. Anytime Labor provided Plaintiff with the arbitration agreement and the data related  
3 to the online execution of the agreement.

4 5. Plaintiff is in the process of reviewing the documentation to determine whether he  
5 will voluntarily submit this matter to arbitration.

6 6. The Parties understand this Court previously Ordered that the Parties' Second  
7 Extension would be the last extension granted. However, in this instance, the Parties believe that  
8 good cause exists for a final weeklong extension as the additional time may prevent unnecessary  
9 motion work which would be in the interests of the judicial economy.

10 7. Based on the foregoing, the Parties have agreed to extend the deadline for Defendant  
11 Anytime Labor to file its response to Plaintiff's Complaint to July 7, 2025. This would allow the  
12 Parties additional time to determine how to proceed regarding Plaintiff's arbitration agreement.

13 8. This is the third stipulation to extend the time for Defendant Anytime Labor to  
14 respond to Plaintiff's Complaint.

15 9. The Parties believe these circumstances constitute good cause for granting an  
16 extension. *See* Fed. R. Civ. P. 6(b)(1).

17 10. This Stipulation is made in good faith and not for the purpose of delay.

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11. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

Dated this 26th day of June, 2025.

GREENBERG GROSS LLP

JACKSON LEWIS P.C.

/s/ Marian L. Massey

/s/ Thomas W. Maroney

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*Matthew Jackson*

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*Anytime Labor LLC*

**ORDER**

**NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

IT IS SO ORDERED.

  
United States ~~District~~ Magistrate Judge

Dated: June 27, 2025